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United States Department of Justice

United States Attorney Northern District of New York

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August 2, 2022

Hon. Mae A. D'Agostino United States District Court Judge Northern District of New York James T. Foley Federal Courthouse 445 Broadway Albany, New York 12207

Re: Government Response to Defense Post Trial Motions ico *United States v.*

Xiaoqing Zheng 19-CR-156 (MAD)

Dear Judge D'Agostino,

On August 2, 2022 the government filed a 28 page memorandum of law (Dkt. No. 282) in opposition to the defendant's post-trial motions. The government respectfully requests, pursuant to L.R.Cr.P. 12.1(a), permission to file the aforementioned memorandum of law which exceeds the Court's page limit of 25 pages. The oversized memorandum of law is necessary to adequately respond to the arguments raised by the defendant in his post-trial motions.

Thank you.

Very truly yours,

CARLA B. FREEDMAN United States Attorney

By: <u>/s/ Richard Belliss</u> Richard D. Belliss

Assistant U.S. Attorney

Copy to:

Kevin Luibrand, Esq. Luibrand Law Firm, PLLC 950 New Loudon Road, Suite 270 Latham, New York 12110 (via ecf)

Attorney for Xiaoqing Zheng